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April 1, 2015

VIA ECF & FACSIMILE (212) 805-7986

Hon. Paul G. Gardephe
United States District Court
Southern District of New York
40 Centre Street
New York, New York 10007

Re: *Grant v. Warner Music Group Corp. et al*, No. 13 Civ. 4449;
Henry v. Warner Music Group Corp., et al, No. 13 Civ. 5031

Your Honor:

This firm represents the defendants in the above referenced actions. On behalf of all parties, I write to respectfully request an additional 45-day extension on the date for the plaintiffs to file documents in support of their motion for preliminary approval of the parties' settlement agreement, to and including Monday, May 25, 2015.

As set forth in my March 9, 2015 letter, in or around January 2015, the parties reached an agreement as to the terms under which this matter may be settled. That agreement imposed upon each party the duty to satisfy certain conditions prior to seeking the Court's preliminary approval of the settlement terms. While all parties remain committed to settling this matter on the terms memorialized in their settlement agreement, certain procedural challenges preclude plaintiffs from filing their motion for preliminary approval by the current April 8 deadline. Accordingly, on behalf of all parties, we respectfully request an additional 45-day extension of time for the filing of the plaintiffs' anticipated motion.

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We thank the Court in advance for its attention to this request, and are available to address any questions or concerns the Court may have.

Respectfully submitted,

Davis Wright Tremaine LLP



Michael Goettig

cc: Lloyd Ambinder (via ECF)
LaDonna Lusher (via ECF)
Jeffrey Brown (via ECF)
Lenard Leeds (via ECF)
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